

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

)	
In re)	Chapter 11 Case
)	
DELPHI CORPORATION, <u>et al.</u>)	Case No. 05-44481 (RDD)
)	
Debtors.)	(Jointly Administered)
)	

**CSX CORPORATION'S RESPONSE TO THE REORGANIZED DEBTORS'
FORTY-SEVENTH OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. § 503(B) AND
FED. R. BANKR. P. 3007 TO (I) DISALLOW AND EXPUNGE (A) CERTAIN
ADMINISTRATIVE EXPENSE BOOKS AND RECORDS CLAIMS, (B) A CERTAIN
ADMINISTRATIVE EXPENSE DUPLICATE CLAIM, AND (C) CERTAIN
ADMINISTRATIVE EXPENSE DUPLICATE SUBSTANTIAL CONTRIBUTION CLAIMS,
AND (II) MODIFY CERTAIN ADMINISTRATIVE EXPENSE CLAIMS**

CSX Corporation ("CSX"), by counsel, hereby submits its response (the "Response") to the Debtors' Forty-Seventh Omnibus Objection pursuant to 11 U.S.C. § 503(b) and Fed. R. Bankr. P. 3007 to (I) Disallow and Expunge (A) Certain Administrative Expense Books and Records Claims, (B) A Certain Administrative Expense Duplicate Claim, and (C) Certain Administrative Expense Duplicate Substantial Contribution Claims, and (II) Modify Certain Administrative Expense Claims (the "Objection"), and in support thereof respectfully states as follows:

RESPONSE

1. On July 14, 2009, CSX filed an administrative expense request in the amount of \$103,986.16 ("Claim No. 18700"). Claim No. 18700 is valid pursuant to the description and accompanying documents included in Claim No. 18700. CSX and the Reorganized Debtors engaged in good faith arms length negotiations resolving, among other claims, Claim No. 18700, which resulted in a global settlement in principal, subject to finalization in the form of a stipulation. The parties are negotiating the terms of the

stipulation at this time and CSX anticipates entering into a consensual form of stipulation in the near future.

2. CSX requests that the hearing on this matter with respect to CSX and Claim No. 18700 be adjourned. Such adjournment is appropriate as it may moot the need for a hearing, which will preserve judicial and the parties' resources and avoid a piecemeal resolution of CSX's claims.

RESERVATION OF RIGHTS

3. CSX reserves the right to update or supplement this Response as necessary.

CONCLUSION

WHEREFORE, CSX respectfully requests the Court to enter an order (i) adjourning the hearing on the Objection to Claim No. 18700 so that the parties may finalize a resolution of all claims with CSX; and (ii) granting such other and further relief as the Court deems just and appropriate.

Dated: May 17, 2010

Respectfully submitted,

/s/ John H. Maddock III
John H. Maddock III
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Counsel to CSX Corporation

CERTIFICATE OF SERVICE

I, John H. Maddock, III, hereby certify that on the 17th day of May, 2010, I electronically filed a CSX Transportation, Inc.'s Response to the Reorganized Debtors' Forty-Seventh Omnibus Objection pursuant to 11 U.S.C. § 503(b) and Fed. R. Bankr. P. 3007 to (I) Disallow and Expunge (A) Certain Administrative Expense Books and Records Claims, (B) A Certain Administrative Expense Duplicate Claim, and (C) Certain Administrative Expense Duplicate Substantial Contribution Claims, and (II) Modify Certain Administrative Expense Claims with the Clerk of the Court using the CM/ECF system.

I also served the following via United States Postal Service:

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/s/ John H. Maddock III
John H. Maddock III

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